

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Nautilus Insurance Company,) C/A No. 2:22-cv-1307-RMG
)
 Plaintiff,)
 Versus)
)
Richard Alexander Murdaugh, Sr., Cory)
Fleming, Moss & Kuhn, P.A., Chad)
Westendorf, and Palmetto State Bank,)
)
 Defendants.)

**MOSS & KUHN, P.A.'S
OBJECTIONS TO PLAINTIFF'S
SUPPLEMENTAL EXHIBIT LIST**

The Defendant Moss & Kuhn, P.A. (hereinafter "this Respondent"), by its undersigned attorneys, hereby submits the following list of objections to Nautilus Insurance Company's exhibits it intends to or may present at trial:

| No. | Description | Bates/Docket No. (if applicable) | Objections |
|-----|---|-------------------------------------|--------------------------|
| 1 | March 8, 2018 Letter from Cory Fleming regarding institution of wrongful death claim against Defendant Murdaugh | ECF No. 187-3 | |
| 2 | April 22, 2019 Letter from John Grantland to Cory Fleming enclosing check for \$3.8m from Nautilus and establishing conditions for depositing and releasing those funds from trust. | ECF No. 187-23 | |
| 3 | April 18, 2019 Nautilus check for \$3.8m | ECF No. 187-31 | |
| 4 | December 20, 2017 email to Cory Fleming from Forge Consultants | Ex. 7 to Fleming deposition | |
| 5 | May 25, 2023 Transcript of Cory Fleming Federal Guilty Plea | ECF No. 187-1 | FRE 401, 403, 801 |

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| 6 | December 13, 2018 Application and December 18, 2018 order Appointing successor PR | ECF No. 187-10 | |
| 7 | December 18, 2018 Fiduciary letter issued by Probate Court to Successor PR | ECF No. 187-14 | |
| 8 | December 19, 2018 Petition for Approval of Wrongful Death Settlement (Lloyd's) | ECF No. 187-15 | FRE 401, 403, 801 |
| 9 | November 28, 2018 Fleming emails regarding appointment of Chad Westendorf as successor PR | ECF No. 187-7 | |
| 10 | January 7, 2018 Disbursement Statement - Lloyd's – 475k | ECF No. 187-19 | FRE 401, 403, 801 |
| 11 | May 13, 2019 Disbursement Statement – Lloyd's 505k, Nautilus 3.8 | ECF No. 187-27 | |
| 12 | September 30, 2021 Account ledger showing disbursements from M&K Trust Account | ECF No. 187-21 | |
| 13 | May 13, 2019 Signed, unfiled order approving settlement | ECF No. 187-24 | |
| 14 | September 30, 2020 Emails re clerk of court's Notice of Hearing re ADR Compliance for case 2018-CP-25-00505 | ECF No. 187-29 | |
| 15 | October 6, 2020 Filed Stipulation of Dismissal for case 2018-CP-25-00505 | ECF No. 187-30 | |
| 16 | March 25, 2019 Mediation agreement in re: claims of the estate of Gloria Satterfield | ECF No. 187-32 | |
| 17 | May 27, 2022 Confession of Judgment and Stipulation by RA | ECF No. 187-34 | FRE 401, 403, 801 |

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| | Murdaugh in Satterfield suit, 2021-CP-25-00298 | | |
| 18 | Fleming State Indictment | ECF No. 240-1 | FRE 401, 403, 801 |
| 19 | Fleming State Guilty Plea | ECF No. 240-2 | FRE 401, 403, 801 |
| 20 | March 28, 2018 - Probate court appointment of Michael Satterfield as PR for Estate of Gloria Satterfield | ECF No. 187-4 | |
| 21 | March 8, 2018 letter from Alex Murdaugh assistant to medical group re Gloria Satterfield medical records | ECF No. 187-5 | |
| 22 | Handwritten notes by C. Fleming on March 1, 2018 email re wrongful death Claim | CHF_00005 | |
| 23 | April 2, 2018 email from Murdaugh assistant to Fleming assistant re PR Appointment | CHF_00262-64 | |
| 24 | July 20, 2018 email from Fleming assistant to Murdaugh assistant attaching Satterfield Authorizations | CHF_00254-56 | |
| 25 | November 30, 2018 email from Fleming assistant to Lloyds'-appointed defense counsel requesting check made out to C. Westendorf | CHF_00001 | FRE 401, 403, 801 |
| 26 | January 14-15 email exchange between Fleming and Westendorf re filing of document pertaining to Lloyd's settlement | CHF_00288-89 | FRE 401, 403, 801 |
| 27 | February 14, 2019 emails between Fleming and Fleming assistant regarding collecting Satterfield medical records from Hampton | CHF_00207-09 | FRE 401, 403, 801 |

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| 28 | March 27, 2019 email from A. Miller to J. Lasky regarding mediation | NAUTILUS_006377 | |
| 29 | February 22-25, 2019 email exchange between J. Grantland, A. Miller regarding mediation | PHELPS-000366-67 | |
| 30 | March 22-24, 2019 email exchange between A. Miller, K. Karam regarding mediation | PHELPS-000932 | |
| 31 | March 29, 2019 email from Fleming to Grantland regarding structured settlement | CHF_00327 | |
| 32 | March 30, 2019 email from Fleming to Grantland regarding structured settlement | CHF_00332-33 | |
| 33 | April 10, 2019 emails between Fleming and assistant regarding release | CHF_00162-63 | |
| 34 | April 25, 2019 email from Fleming requesting Judge Mullen hear petition to approve settlement | CHF_000003 | |
| 35 | May 6, 2019 emails between Fleming and Grantland regarding approval proceeding | CHF_000346, 00348 | |
| 36 | October 5, 2020 stipulation of dismissal of case number 2018-CP-25-00505 in Hampton County, South Carolina | n/a | |
| 37 | October 6, 2020 emails between Fleming and assistant regarding disbursement of addition funds to Forge | CHF_00157-58 | |
| 38 | November 13, 2018 email regarding change of Personal Representative | CHF_00088-0090 | FRE 401, 403, 801 |

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| 39 | Nautilus Claims Notes | NAUTILUS_002381-564 | |
| 40 | MKF cancelled check | PSB 000355 (Ex. 3 to M&K 30(b)(6) deposition) | |
| 41 | MKF cancelled check | MOSS & KUHN 0068 (Ex. 4 to M&K 30(b)(6) deposition) | |
| 42 | MKF cancelled check | BBT (9-27-2021)-001311 (Ex. 5 to M&K 30(b)(6) deposition) | |
| 43 | November 6, 2018 letter from S. Wallinger to Brit, CJW with comprehensive report on claim by Murdaugh re Satterfield | M&G000092-118 | |
| 44 | November 12, 2018 letter from D. Rheney to A. Miller re Lloyds' tendering limits | M&G000121-23 | |
| 45 | November 8, 2018 emails between Fleming to Jennifer Johnson re extension to response to demand letter | CHF_00277 | |
| 46 | February 21, 2019 emails between Fleming and Grantland re mediation | CHF_00304 | |
| 47 | March 29, 2019 emails between Fleming to Grantland re Conservatorship | CHF_00327-00328 | |
| 48 | March 30, 2019 email from Fleming and Grantland re check payee | CHF_00332-00333 | |

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December 23, 2024
Charleston, South Carolina

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